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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In Re:
 USA COMMERCIAL MORTGAGE
 COMPANY,
 USA CAPITAL REALTY ADVISORS, LLC,
 USA CAPITAL DIVERSIFIED TRUST DEED
 FUND, LLC, USA CAPITAL FIRST TRUST
 DEED FUND, LLC, USA SECURITIES, LLC,
 Debtors.

Affects:

- ☐ All Debtors
☒ USA Commercial Mortgage Company
☐ USA Capital Realty Advisors, LLC
☐ USA Capital Diversified Trust Deed Fund, LLC
☐ USA Capital First Trust Deed Fund, LLC
☐ USA Securities, LLC

Case No. BK-S-06-10725-LBR
 Case No. BK-S-06-10726-LBR
 Case No. BK-S-06-10727-LBR
 Case No. BK-S-06-10728-LBR
 Case No. BK-S-06-10729-LBR

CHAPTER 11

Jointly Administered Under
 Case No. BK-S-06-10725 LBR

**STIPULATION TO EXTEND
 DEADLINE TO FILE COMPLAINT
 TO AVOID AND RECOVER PRE-
 PETITION TRANSFERS PURSUANT
 TO 11 U.S.C. §§ 547, 548 AND 550**

USACM Liquidating Trust (the "Trust"), Donald Granatstein ("Granatstein") and
 International Resort Management ("IRM," together with the Trust and Granatstein, the
 "Parties"), by and through their undersigned counsel, hereby stipulate to extend the

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1 deadline for the Trust to file a complaint to avoid and recover pre-petition transfers
2 pursuant to 11 U.S.C. §§ 547, 548, and 550 (the “Stipulation”) against Granatstein and
3 IRM. In support of this Stipulation, the Parties state as follows:

4 1. The Trust asserts that it has claims against Granatstein and IRM for the
5 avoidance and recovery of preferential and/or fraudulent pre-petition transfers (the
6 “Transfers”) received from USA Commercial Mortgage (“USACM”) by Granatstein and
7 IRM during the 90-day period preceding the filing of USACM’s chapter 11 bankruptcy
8 case on April 13, 2006 (the “Petition Date”).

9 2. On February 12, 2008, in pursuit of its avoidance claims, the Trust made
10 demand upon Granatstein and IRM for the return of the Transfers. Counsel for
11 Granatstein and IRM responded to the Trust’s demand indicating a further response would
12 be forthcoming upon receipt of additional information from Granatstein and IRM.

13 3. The Trust has not yet received or analyzed the additional information from
14 Granatstein and IRM regarding the Transfers and the services Granatstein and IRM
15 provided to USACM pre-petition. The current deadline for the Trust to file a complaint to
16 avoid and recover the Transfers, pursuant to 11 U.S.C. §§ 547, 548, and 550 (the
17 “Complaint”), is April 12, 2008.

18 4. In order for Granatstein and IRM to provide the Trust with the requested
19 information and so that the Trust should have sufficient time to analyze the information
20 provided by Granatstein and IRM, the Parties have agreed that an extension of the
21 deadline for filing a Complaint is warranted.

22 5. The Parties submit that an extension to Monday, May 12, 2008, of the
23 deadline for filing a Complaint is reasonable and will effectively conserve the Court’s
24 valuable resources and serve the efficiencies of this matter by facilitating the exploration
25 of a resolution of the Trust’s avoidance claims against Granatstein and IRM.

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WHEREFORE, the Parties request that the Court enter an order approving this Stipulation and extending the deadline, to and including Monday, May 12, 2008, for the Trust to file a Complaint against Granatstein and IRM.

Respectfully submitted:

LEWIS AND ROCA LLP

SHUTTS & BOWEN LLP

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